GRANITE CITY PUBLIC HEARING **NL INDUSTRIES, INC.**

February 8, 1990

7:00 p.m.

Questions?

Contact: Janet Smith (212) 421-7200
Steve Holt (609) 443-2405
Frank Hale (804) 231-2966

Introduction

This presentation focuses on what NL Industries, Inc. has done at the Taracorp site in Granite City over the last five years, and NL's cleanup proposal, Alternative D. We will also comment on the U.S. Environmental Protection Agency's cleanup proposal, Alternative H. These remarks will be brief.

In 1985, NL signed a consent order with U.S.EPA and Illinois EPA to retain an independent expert consulting firm to conduct a remedial investigation and feasibility study for the Taracorp site. We have spent over 1.5 million dollars on this work. We have studied the effects of the past and present industrial operations at the site on air, water, groundwater and public health. We also explored cleanup proposals for the site and the surrounding areas, and made a recommendation for what we believe is a good and effective environmental cleanup that is appropriate for Granite City. During the past five years, we have worked with U.S.EPA, and the State of Illinois, and solicited their input, as well as listened to input from the Granite City community. We have met with Mayor Von Dee Cruse and other public officials. We have tried to accommodate everyone's concerns. We appear here tonight in that spirit.

ALTERNATIVE D: THE ON-SITE CLEANUP

- Excavate affected soil in the Taracorp site and place it in the waste pile
- Remove the drummed lead waste from the Taracorp waste pile and recycle it
- Move the neighboring St. Louis Lead Recyclers pile onto Taracorp's property and consolidate it with the Taracorp pile
- Cap the pile and cover it with grass
- Maintain the fence to restrict site access
- Install additional deep groundwater wells and monitor groundwater and air quality to assure no increases occur
- Important Notes: Ambient air quality levels of lead in Granite City are 0.2 $\mu g/m^3$. The federal standard, established to protect the public health, is 1.5 $\mu g/m^3$. The amount of lead in Granite City's drinking water supply is "not detectable." These facts explain why the cleanup alternatives being discussed concentrate on capping the Taracorp waste pile and cleaning up lead-in-soil on and off the site.

ALTERNATIVE D: THE OFF-SITE CLEANUP

VENICE AND EAGLE PARK ACRES

- Excavate the battery case fill material and place it in the Taracorp waste pile
- Restore the areas with clean fill covered by pavement or grass, as before

OFFSITE RESIDENTIAL SOILS CLEANUP

- Excavate affected soil above 1000 parts per million lead-in-soil in the residential blocks surrounding the plant (Areas 2 and 3) and place the soil in the Taracorp waste pile
- Restore the areas

What's the difference between Alternatives D and H?

The main difference is the cleanup level for lead-in-soil in residential areas. In general, Alternative H would cleanup ares with soil lead above 500 ppm, while Alternative D cleans up areas with soil lead above 1000 ppm. The residential soil cleanup portion of Alternative H would cost roughly ten times as much as Alternative D. From start to finish, Alternative H will take seven years, as opposed to a little over two years for Alternative D. So, a lot of money and time would be spent on Alternative H, with no additional environmental benefit.

How do you choose between 500 and 1000 ppm?

EPA has specifically developed guidance with respect to the cleanup of lead-in-soil at Superfund sites. The guidance emphasizes that a site specific risk assessment should be performed to arrive at the level of lead-in-soil for residential area cleanups. Further, the guidance says that the level is expected to be in the 500 to 1000 ppm range, but may move up or down based on site specific conditions.

How did NL conduct the risk assessment for Granite City?

We had an agreement with EPA which required us to conduct a risk assessment. As part of that work, we reviewed actual data from a health study performed by the State of Illinois Department of Health that showed the level of lead in blood in Granite City residents was the same as the national average. The study also showed no physiological effects of lead in blood. Next, toxicologists performed theoretical risk assessments, using two different approaches, to calculate what level of soil lead should be removed to prevent elevated blood lead in residents of Granite City. So, NL recommended a cleanup level for soil lead by conducting a site specific risk assessment, using actual data from Granite City residents, collected by the State, and also using calculations performed two different ways by expert toxicologists. In order to assure that we brought the best possible science to bear upon this process, the risk assessment was reviewed by another toxicologist for a second opinion, who confirmed the method and conclusions.

What was the outcome of the risk assessment?

The result of the risk assessment was well above 1000 ppm. NL proposed a cleanup of residential areas to 1000 ppm to provide an extra margin of safety.

Is there a basis for Alternative H's 500 ppm cleanup level?

NL has consistently attempted to bring the best and most up-to-date science to bear on designing a risk assessment and a residential soil cleanup for Granite City. EPA chose to disregard NL's risk assessment. But, EPA selected a cleanup level of 500 ppm without conducting a risk assessment of its own, in breach of its own guidance. EPA has never articulated a basis for using 500 ppm. They have not done their own risk assessment. In support of their choice, they have referred to other sites or studies which are not comparable to Granite City and which are inconsistent with EPA guidance requiring a site specific risk assessment. Interestingly, EPA has told us that the Agency for Toxic Substances and Disease Registry, a federal agency charged with protecting the public health at Superfund sites, has examined Granite City, but EPA has refused to release the report directly to us. In sum, we think that the choice of 500 ppm in Alternative H is completely arbitrary and scientifically unfounded.

What are some of the risks and problems of Alternative H?

To begin with, EPA says: "The amount of digging required could expose the community to contaminated dust." To NL, this does not make much sense. After a study that took five years and cost 1.5 million dollars, that detected no adverse health effects, no contaminated air, water or groundwater, it simply does not make sense to expose the community to dust by digging up areas that, in our judgment, do not otherwise pose a risk.

But there are other serious problems with Alternative H. Truck traffic is a major problem. As everyone knows, trucks are noisy and cause air pollution. We have calculated roughly that Alternative H will bring 30,000 additional trucks into the Granite City community. That's 30,000 more than Alternative D.

We have also calculated that the risk of traffic accidents and injury will be nearly five times greater during Alternative H, because there is five times as much truck traffic. So, Alternative H would bring community disruption, air pollution, noise pollution and traffic safety problems to Granite City, not to mention the destructive impact of heavy truck traffic on the paved surfaces of local roads.

Where will the excavated soil go?

In both Alternative D and H, the soil is disposed of in the Taracorp pile. But Alternative H would create a mountainous pile. We also think that disposal of all of the soil excavated in Alternative H in the Taracorp pile is infeasible, because the pile would be too large.

How long will a cleanup take?

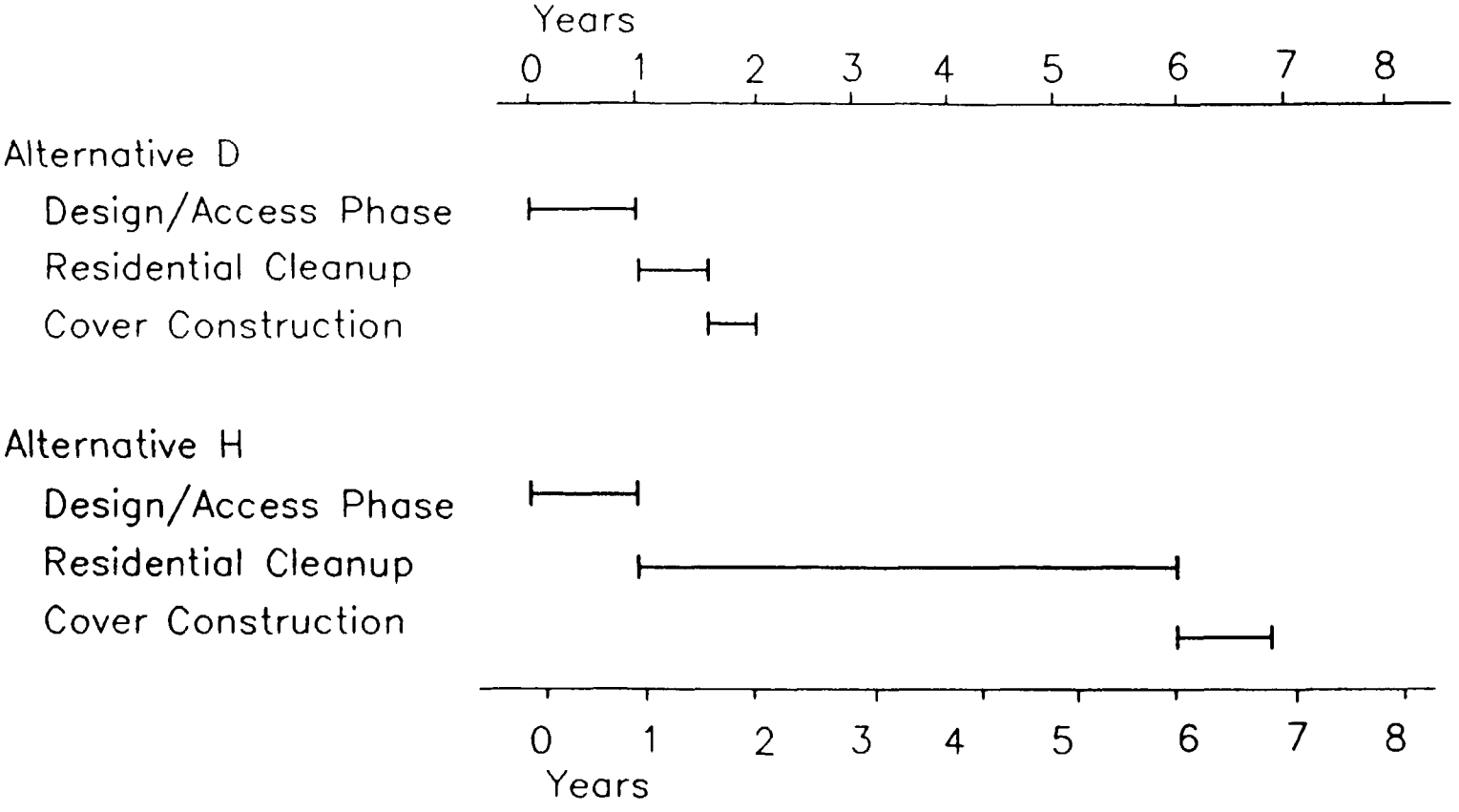
Attached is a chart that shows that Alternative D will take about two years, while Alternative H will take much longer, approximately seven years.

Conclusion

Thank you for your attention. This hearing is being held to explain the remedial options to you and solicit your input. EPA is required by law to take your views into account when it selects a remedy. So, if you have a preference, put it in writing and send it to EPA before February 24th.

jds15.321

TIME COMPARISON



Assumes twelve 5-person crews full time with a truck and driver/3 crews